

U.S. Department of Justice

Washington, DC 20530

Supplemental Statement**Pursuant to the Foreign Agents Registration Act of 1938, as amended**For 6 Month Period Ending 01/31/2022
(Insert date)**I - REGISTRANT**

1. (a) Name of Registrant
Daniel J. Edelman, Inc.
- (b) Registration Number
3634
- (c) Primary Business Address
111 North Canal Street, Suite 1100, Chicago, IL 60606

2. Has there been a change in the information previously furnished in connection with the following?

(a) If an individual:

- | | | |
|---------------------------|------------------------------|-----------------------------|
| (1) Residence address(es) | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| (2) Citizenship | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| (3) Occupation | Yes <input type="checkbox"/> | No <input type="checkbox"/> |

(b) If an organization:

- | | | |
|--------------------------|---|--|
| (1) Name | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| (2) Ownership or control | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| (3) Branch offices | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |

(c) Explain fully all changes, if any, indicated in Items (a) and (b) above.

Registrant address change due to office move.

IF THE REGISTRANT IS AN INDIVIDUAL, OMIT RESPONSES TO ITEMS 3, 4, 5, AND 6.

3. If the registrant previously filed an Exhibit C
- ¹
- , state whether any changes therein have occurred during this 6 month reporting period. Yes
- ☐
- No
- ☒

If yes, has the registrant filed an updated Exhibit C? Yes ☐ No ☐

If no, please file the updated Exhibit C.

¹ The Exhibit C, for which no printed form is provided, consists of a true copy of the charter, articles of incorporation, association, and by laws of a registrant that is an organization. (A waiver of the requirement to file an Exhibit C may be obtained for good cause upon written application to the Assistant Attorney General, National Security Division, U.S. Department of Justice, Washington, DC 20530.)

4. (a) Have any persons become partners, officers, directors or similar officials during this 6 month reporting period?

Yes ☐ No ☒

If yes, furnish the following information:

Name	Residence Address	Citizenship	Position	Date Assumed
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(b) Have any persons ceased acting as partners, officers, directors or similar officials of the registrant during this 6 month reporting period?

Yes ☐ No ☒

If yes, furnish the following information:

Name	Position	Date Ceased
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5. (a) Has any person named in Item 4(a) rendered services directly in furtherance of the interests of any foreign principal?

Yes ☐ No ☒

If yes, identify each such person and describe the service rendered.

Name	Foreign Principal(s) Represented	Services
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(b) During this 6 month reporting period, did any employee or individual working in any other capacity begin rendering services to the registrant directly in furtherance of the interests of any foreign principal(s) in other than a clerical or secretarial, or in a related or similar capacity?

Yes ☒ No ☐

Name	Foreign Principal	Residence Address	Citizenship	Position	Date Assumed
See Appendix for Response					

(c) Have any employees or individuals, who have filed a short form registration statement, terminated their employment or connection with the registrant during this 6 month reporting period?

Yes ☒ No ☐

If yes, furnish the following information:

Name	Position or Connection	Date Terminated
Mohammed Moneer Mahmoud AL Daqqaq		08/31/2021
Chad Tandler		01/03/2022
Weston Yates Loyd		12/10/2021

(d) Have any employees or individuals, who have filed a short form registration statement, terminated their connection with any foreign principal during this 6 month reporting period?

Yes ☒ No ☐

If yes, furnish the following information:

Name	Position or Connection	Foreign Principal	Date Terminated
See Appendix for Response			

6. Have short form registration statements been previously filed by all of the persons named in Items 5(a) and 5(b) of the supplemental statement or submitted with this filing?

Yes ☒ No ☐

If no, list names of persons who have not previously filed the required statement or are not submitting a short form with this filing.

II - FOREIGN PRINCIPAL

7. Has the registrant's connection with any foreign principal(s) ended during this 6 month reporting period?

Yes ☒No ☐

If yes, furnish the following information:

Foreign Principal

United Nations Development Programme on behalf of the Government of Panama
Bahrain Economic Development Board
Mashreqbank psc

Date of Termination

12/31/2021
12/05/2021
11/25/2021

8. Has the registrant added any new foreign principal(s)² during this 6 month reporting period?

Yes ☒No ☐

If yes, furnish the following information:

Foreign Principal

Neom Company
Bahrain Economic Development Board
Snam S.p.A.
United Nations Development Programme on behalf of the Government of Panama 2

Date Added

10/07/2021
11/03/2021
01/25/2022
01/10/2022

9. In addition to those named in Items 7 and 8, if any, list the foreign principal(s) whom the registrant continued to represent during the 6 month reporting period.

AXA

10. (a) Has the registrant filed Exhibits A and B for the newly added foreign principal(s), if any, listed in Item 8?

Exhibit A³ Yes ☒ No ☐ N/A ☐

Exhibit B⁴ Yes ☒ No ☐ N/A ☐

If no, please file the required exhibit.

(b) Have there been any changes in the Exhibits A and B previously filed for any foreign principal(s) whom the registrant represented during this 6 month period? Yes ☒ No ☐

If yes, has the registrant filed an amendment to these exhibits? Yes ☒ No ☐

If no, please file the required amendment.

² The term "foreign principal" includes, in addition to those defined in Section 1(b) of the Act, an individual organization any of whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in major part by a foreign government, foreign political party, foreign organization or foreign individual. (See Rule 100(a) (9)). A registrant who represents more than one foreign principal is required to list in the statements he files under the Act only those principals for whom he is not entitled to claim exemption under Section 3 of the Act. (See Rule 208.)

³ The Exhibit A, which is filed on Form NSD-3, sets forth the information required to be disclosed concerning each foreign principal.

⁴ The Exhibit B, which is filed on Form NSD-4, sets forth the information concerning the agreement or understanding between the registrant and the foreign principal.

III - ACTIVITIES

11. During this 6 month reporting period, has the registrant engaged in any activities for or rendered any services to any foreign principal named in Items 7, 8, or 9 of this statement? Yes ☒ No ☐

If yes, identify each foreign principal and describe in full detail all activities and services:

Foreign Principal	Activities/Services
See Appendix for Response	

12. During this 6 month reporting period, has the registrant, on behalf of any foreign principal, engaged in political activity⁵ as defined below? Yes ☒ No ☐

If yes, identify each foreign principal and describe in full detail all such political activity, indicating, among other things, the relations, interests and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored or delivered speeches, lectures, social media, internet postings, or media broadcasts, give details as to dates, places of delivery, names of speakers and subject matter. The response must include, but not be limited to, activities involving lobbying, promotion, perception management, public relations, economic development, and preparation and dissemination of informational materials.

Set forth below a general description of the registrant's political activities.

See Appendix for Response

Set forth below in the required detail the registrant's political activities.

Foreign Principal	Date	Contact	Method	Purpose
See Appendix for Response				

13. In addition to the above described activities, if any, has the registrant engaged in activity or rendered any services on its own behalf which benefits the registrant's foreign principal(s)? Yes ☐ No ☒

If yes, describe fully.

Foreign Principal	Activities/Services

⁵ "Political activity," as defined in Section 1(o) of the Act, means any activity that the person engaging in believes will, or that the person intends to, in any way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting or changing the domestic or foreign policies of the United States or with reference to political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

IV - FINANCIAL INFORMATION**14. (a) RECEIPTS-MONIES**

During this 6 month reporting period, has the registrant received from any foreign principal named in Items 7, 8, or 9 of this statement, or from any other source, for or in the interests of any such foreign principal, any contributions, income or money either as compensation or otherwise? Yes ☒ No ☐

If no, please explain why no monies were received.

See Appendix for Response

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies.⁶

Foreign Principal See Appendix for Response	Date Received	From Whom	Purpose	Amount	Subtotal
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\$ 1,042,403.70

Total

(b) RECEIPTS - FUNDRAISING CAMPAIGN

During this 6 month reporting period, has the registrant received, as part of a fundraising campaign⁷, any money on behalf of any foreign principal named in Items 7, 8, or 9 of this statement? Yes ☐ No ☒

If yes, has the registrant previously filed an Exhibit D⁸ to its registration? Yes ☐ No ☐

If yes, indicate the date the Exhibit D was filed. Date _____

If no, please file the required Exhibit D.

(c) RECEIPTS-THINGS OF VALUE

During this 6 month reporting period, has the registrant received any thing of value⁹ other than money from any foreign principal named in Items 7, 8, or 9 of this statement, or from any other source, for or in the interests of any such foreign principal? Yes ☐ No ☒

If yes, furnish the following information:

Foreign Principal	Date Received	From Whom	Purpose	Thing of Value
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^{6, 7} A registrant is required to file an Exhibit D if he/she collects or receives contributions, loans, moneys, or other things of value for a foreign principal, as part of a fundraising campaign. (See Rule 201(e)).

⁸ An Exhibit D, for which no printed form is provided, sets forth an account of money collected or received as a result of a fundraising campaign and transmitted for a foreign principal.

⁹ Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

15. (a) DISBURSEMENTS-MONIES

During this 6 month reporting period, has the registrant disbursed or expended monies in connection with activity on behalf of any foreign principal named in Items 7, 8, or 9 of this statement or transmitted monies to any such foreign principal? Yes ☒ No ☐

If no, explain why no disbursements were made.

See Appendix for Response

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies, including monies transmitted, if any, to each foreign principal.

Foreign Principal	Date	Recipient	Purpose	Amount	Subtotal
See Appendix for Response					

\$	62,490.14
<hr/>	
	Total

(b) DISBURSEMENTS-THINGS OF VALUE

During this 6 month reporting period, has the registrant disposed of anything of value¹⁰ other than money in furtherance of or in connection with activities on behalf of any foreign principal named in Items 7, 8, or 9 of this statement?

Yes ☐No ☒

If yes, furnish the following information:

Foreign Principal	Date	Recipient	Purpose	Thing of Value
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(c) DISBURSEMENTS-POLITICAL CONTRIBUTIONS

During this 6 month reporting period, has the registrant (or any short form registrant) from its own funds and on its own behalf either directly or through any other person, made any contributions of money or other things of value¹¹ in connection with an election to any political office, or in connection with any primary election, convention, or caucus held to select candidates for political office?

Yes ☐No ☒

If yes, furnish the following information:

Date	Donor	Political Organization/Candidate	Method	Amount/Thing of Value
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10, 11 Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

V - INFORMATIONAL MATERIALS

16. (a) During this 6 month reporting period, has the registrant prepared, disseminated or caused to be disseminated any informational materials?¹² Yes ☒ No ☐

(b) If yes, identify each such foreign principal for which informational materials were disseminated and respond to the remaining items in this section.

United Nations Development Programme on behalf of the Government of Panama
Neom Company
Bahrain Economic Development Board
United Nations Development Programme on behalf of the Government of Panama 2

17. During this 6 month reporting period, has a budget been established or specified sum of money allocated to finance the registrant's activities in preparing or disseminating informational materials? Yes ☐ No ☒

If yes, identify each such foreign principal, and specify the period of time and the amount.

Foreign Principal	Period of Time	Amount
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Total

18. During this 6 month reporting period, has the registrant's activities in preparing, disseminating or causing the dissemination of informational materials included the use of any of the following:

- | | | | |
|--|---|---|--|
| <input type="checkbox"/> Magazine or newspaper | <input type="checkbox"/> Advertising campaigns | <input type="checkbox"/> Press releases | <input type="checkbox"/> Pamphlets or other publications |
| <input type="checkbox"/> Lectures or speeches | <input type="checkbox"/> Radio or TV broadcasts | <input type="checkbox"/> Motion picture films | <input type="checkbox"/> Letters or telegrams |
| <input type="checkbox"/> Email | | | |
| <input type="checkbox"/> Website URL(s): _____ | | | |
| <input type="checkbox"/> Social media websites URL(s): _____ | | | |
| <input type="checkbox"/> Other (specify) _____ | | | |

See Appendix for Response

19. During this 6 month reporting period, has the registrant prepared, disseminated, or caused to be disseminated informational materials among any of the following groups:

- | | | |
|--|---|---|
| <input type="checkbox"/> Public officials | <input type="checkbox"/> Newspapers | <input type="checkbox"/> Libraries |
| <input type="checkbox"/> Legislators | <input type="checkbox"/> Editors | <input type="checkbox"/> Educational institutions |
| <input type="checkbox"/> Government agencies | <input type="checkbox"/> Civic groups or associations | <input type="checkbox"/> Nationality groups |
| <input type="checkbox"/> Other (specify) _____ | | |

See Appendix for Response

20. Indicate the language used in the informational materials:

- ☐ English ☐ Other (specify) _____

See Appendix for Response

21. Has the registrant filed with the FARA Unit, U.S. Department of Justice a copy of each item of such informational materials prepared, disseminated or caused to be disseminated during this 6 month reporting period? Yes ☐ No ☐

If no, please file the required informational materials.

See Appendix for Response

22. Has the registrant labeled each item of such informational materials with the statement required by Section 4(b) of the Act?

Yes ☐ No ☐

See Appendix for Response

¹² The term informational materials includes any oral, visual, graphic, written, or pictorial information or matter of any kind, including that published by means of advertising, books, periodicals, newspapers, lectures, broadcasts, motion pictures, or any means or instrumentality of interstate or foreign commerce or otherwise. Informational materials disseminated by an agent of a foreign principal as part of an activity in itself exempt from registration, or an activity which by itself would not require registration, need not be filed pursuant to Section 4(b) of the Act.

VI - EXECUTION

In accordance with 28 U.S.C. § 1746, and subject to the penalties of 18 U.S.C. § 1001 and 22 U.S.C. § 618, the undersigned swears or affirms under penalty of perjury that he/she has read the information set forth in this statement filed pursuant to the Foreign Agents Registration Act of 1938, as amended, 22 U.S.C. § 611 *et seq.*, that he/she is familiar with the contents thereof, and that such contents are in their entirety true and accurate to the best of his/her knowledge and belief.

Date

Printed Name

Signature¹³03/15/2022Raquel daFonseca/s/Raquel daFonseca

¹³ This statement shall be signed by the individual agent, if the registrant is an individual, or by a majority of those partners, officers, directors or persons performing similar functions, if the registrant is an organization, except that the organization can, by power of attorney, authorize one or more individuals to execute this statement on its behalf.

Appendix
Response to Item 2(b)(3)

Item 2(b)(3): Has there been a change in the information previously furnished in connection with the following? Branch offices.

111 N. Canal Street, Suite 1100, Chicago, IL 60606

Appendix

Response to Item 5(b)

Item 5(b): During this 6 month reporting period, did any employee or individual working in any other capacity begin rendering services to the registrant directly in furtherance of the interests of any foreign principal(s) in other than a clerical or secretarial, or in a related or similar capacity?

Name	Foreign Principal	Residence Address	Citizenship	Position	Date Assumed
Rami Fahmi	Bahrain Economic Development Board		EGYPT		12/16/2021
Seth Michael Hand	Bahrain Economic Development Board		UNITED KINGDOM		11/11/2021
Luis Felipe Betancourt Silva	United Nations Development Programme on behalf of the Government of Panama		VENEZUELA		08/17/2021
Luis Felipe Betancourt Silva	United Nations Development Programme on behalf of the Government of Panama 2		VENEZUELA		01/12/2022
Gina Rodriguez	AXA		UNITED STATES		01/07/2022
Sean Thomas Willner	United Nations Development Programme on behalf of the Government of Panama 2		UNITED STATES		01/10/2022
Simon Hailes	Bahrain Economic Development Board		UNITED KINGDOM		11/03/2021
Simon Hailes	Mashreqbank psc		UNITED KINGDOM		08/25/2021
Lorena Hoz de Vila	United Nations Development Programme on behalf of the Government of Panama		UNITED STATES		10/25/2021
Lorena Hoz de Vila	United Nations Development Programme on behalf of the Government of Panama 2		UNITED STATES		01/13/2022
George Stothard	Bahrain Economic Development Board		BRAZIL		11/16/2021
Sarah Algethami	Bahrain Economic Development Board		SAUDI ARABIA		12/01/2021
Kaitlyn Jane McBrayer	United Nations Development Programme on behalf of the Government of Panama 2		UNITED STATES		01/10/2022
Jere J. Sullivan Jr.	Neom Company		UNITED STATES		10/12/2021
Jere J. Sullivan Jr.	United Nations Development Programme on behalf of the Government of Panama 2		UNITED STATES		01/10/2022
Tyler Joseph Lehner	Neom Company		UNITED STATES		10/07/2021

Name	Foreign Principal	Residence Address	Citizenship	Position	Date Assumed
Jack O'Shea	United Nations Development Programme on behalf of the Government of Panama		UNITED STATES		08/17/2021
Jack O'Shea	Neom Company		UNITED STATES		10/07/2021
Jack O'Shea	United Nations Development Programme on behalf of the Government of Panama 2		UNITED STATES		01/10/2022
Denise Kling	United Nations Development Programme on behalf of the Government of Panama 2		COLOMBIA		01/10/2022
Debora Comenalli Murray	Snam S.p.A.		UNITED STATES		01/27/2022
Debora Comenalli Murray	Neom Company		UNITED STATES		10/07/2021
Debora Comenalli Murray	United Nations Development Programme on behalf of the Government of Panama 2		UNITED STATES		01/10/2022
Lauren Delaney Phillips	AXA		UNITED STATES		08/05/2021
Darrin Michael Kayser	Snam S.p.A.	Annondale, VA 22003	UNITED STATES	Senior Vice President	01/18/2022
Maria Victoria Prereyra Vera	Snam S.p.A.	Washington, DC 20003	UNITED STATES	Account Supervisor	01/18/2022
Felicia Finney	Snam S.p.A.		UNITED STATES	Assistant Account Executive	01/18/2022
Jere J. Sullivan Jr.	Snam S.p.A.		UNITED STATES	Vice Chairman	01/18/2022
Tyler Joseph Lehner	Snam S.p.A.		UNITED STATES	Senior Account Supervisor	01/18/2022
Daniel Workman	Ontario Ministry of Economic Development, Job Creation and Trade	Washington, DC 20009	UNITED STATES	Senior Vice President	01/26/2022
Adam Ontiveros-Oberg	Ontario Ministry of Economic Development, Job Creation and Trade	Arlington, VA 22209	UNITED STATES	Account Executive	01/26/2022
Jennifer Wright	Ontario Ministry of Economic Development, Job Creation and Trade	McLean, VA 22101	UNITED KINGDOM	Account Supervisor	01/26/2022
Skylar Bergl	Ontario Ministry of Economic Development, Job Creation and Trade	South Orange, NJ 07079	UNITED STATES	Senior Copywriter	01/26/2022
Jere J. Sullivan Jr.	Ontario Ministry of Economic Development, Job Creation and Trade		UNITED STATES	Vice Chairman	01/26/2022
Alexis Anne Redmond	Ontario Ministry of Economic Development, Job Creation and Trade	Toronto,, Ontario CANADA M4L 3E2	CANADA	Executive Vice President, Client Strategy	01/26/2022
Martin Reiser	Ontario Ministry of Economic Development, Job Creation and Trade	Washington, DC 20003	UNITED STATES	US & Canada Chair, Edelman EGA	01/26/2022

Appendix

Response to Item 5(d)

Item 5(d): Have any employees or individuals, who have filed a short form registration statement, terminated their connection with any foreign principal during this 6 month reporting period? If yes, furnish the following information:

Name	Position or Connection	Foreign Principal	Date Terminated
Luis Felipe Betancourt Silva		United Nations Development Programme on behalf of the Government of Panama	12/31/2021
Sean Thomas Willner		United Nations Development Programme on behalf of the Government of Panama	12/31/2021
Lorena Hoz de Vila		United Nations Development Programme on behalf of the Government of Panama	12/31/2021
Kaitlyn Jane McBrayer		United Nations Development Programme on behalf of the Government of Panama	12/31/2021
Jere J. Sullivan Jr.		United Nations Development Programme on behalf of the Government of Panama	12/31/2021
Jack O'Shea		United Nations Development Programme on behalf of the Government of Panama	12/31/2021
Debora Comenalli Murray		United Nations Development Programme on behalf of the Government of Panama	12/31/2021
Rami Fahmi		Bahrain Economic Development Board	12/05/2021
Seth Michael Hand		Bahrain Economic Development Board	12/05/2021
Simon Hailes		Bahrain Economic Development Board	12/05/2021
George Stothard		Bahrain Economic Development Board	12/05/2021
Sarah Algethami		Bahrain Economic Development Board	12/05/2021
Kenneth Jean Jules De Pauw		Mashreqbank psc	11/25/2021
Alex Simmons		Mashreqbank psc	11/25/2021
Seth Michael Hand		Mashreqbank psc	11/25/2021
Carolina Leighton Roesler		Mashreqbank psc	11/25/2021
Mohammed Moneer Mahmoud AL Daggaq		Mashreqbank psc	08/31/2021
Sean Neary		Mashreqbank psc	11/25/2021
Renee Calabro		Mashreqbank psc	11/25/2021
Simon Hailes		Mashreqbank psc	11/25/2021
Mustafa Riffat		Mashreqbank psc	11/25/2021
Chad Tendler		Mashreqbank psc	01/03/2022
Deepshikha Sinha		Mashreqbank psc	11/25/2021
Siddharth Prakash Panicker		Mashreqbank psc	11/25/2021
Leung On Ki Melissa		Mashreqbank psc	11/25/2021
Vasudevan Rangarajan		Mashreqbank psc	11/25/2021
Omar Qirem		Mashreqbank psc	11/25/2021
Doreen Antoine Abi Saleh		Mashreqbank psc	11/25/2021
Vinod Krishnamoorthy		Mashreqbank psc	11/25/2021
Weston Yates Loyd		AXA	12/10/2021

Appendix

Response to Item 11

Item 11: During this 6 month reporting period, has the registrant engaged in any activities for or rendered any services to any foreign principal named in Items 7, 8, or 9 of this statement? If yes, identify each foreign principal and describe in full detail all activities and services:

Foreign Principal(s)	Activities/Services
United Nations Development Programme on behalf of the Government of Panama	<p>UNDP communications campaign on behalf of Government of Panama, Ministry of Foreign Affairs, with focus on raising Panama's profile in the U.S and EU markets:</p> <p>ACCOUNT MANAGEMENT:</p> <ul style="list-style-type: none"> • Development of client messaging and strategic plan. • Conducted client meetings. • Provided counsel on topics and issues of interest to US audiences. <p>MEDIA RELATIONS:</p> <p>Communications campaign to support Panama's initiatives:</p> <ul style="list-style-type: none"> • Conducted outreach and engaged with media to raise awareness of Panama's climate, gender equality, and migration policies. • Supported the client's trip to New York, leveraging media engagements. • Management and content development for social media platform twitter @MissionPanama. <p>*Engagement concluded 12-31-2021</p>
Neom Company	<p>Provide communications support to raise awareness of NEOM Tech and Digital brand in key markets including:</p> <ul style="list-style-type: none"> -Program management and Senior counsel. -Media relations, executive positioning, stakeholder engagement and content development support. -Distribution of 2 Press Releases to U.S. market. -Edelman team attendance at the Future Investment Initiative on October 27th through October 31st to promote the launch of the NEOM Tech & Digital brand, provide event staffing, strategic media and stakeholder engagement and executive message/media training.

Foreign Principal(s)	Activities/Services
Bahrain Economic Development Board	<p>Promote investment, value proposition and brand for the Kingdom of Bahrain. Activities included:</p> <ul style="list-style-type: none"> •Editorial planning and advice •Drafting, distribution of press releases to Gulf Cooperation Council (GCC) media in Gulf region •UK Podcast with London UK Fintech •Distribution of press release via wire to international markets, including U.S. •Held weekly work in progress meetings <p>*Engagement with foreign principal was assumed 10-5-2021 and was ended by Edelman 12-5-2021.</p>
Mashreqbank psc	<ul style="list-style-type: none"> •Provided strategic media counsel in relation to a US regulatory matter •Preparation and Arabic translation of communications materials •Issuing of press statement to UAE media •Media monitoring across US, UAE, India and Africa •Social media analysis <p>*Engagement concluded 11-25-2021</p>
AXA	<p>MEDIA RELATIONS:</p> <ul style="list-style-type: none"> • Introductions to reporters at the New York Times, the Wall Street Journal and CNN. <p>ACCOUNT MANAGEMENT:</p> <ul style="list-style-type: none"> • Bi-weekly client call providing update on workstream. • Weekly compilation of US news articles focused on news of the week and climate initiatives. • Briefing document outlining conference opportunities. <p>OTHER:</p> <ul style="list-style-type: none"> • Scheduling of calls between client and thought leaders in the climate policy space to discuss efforts to combat climate change, and research on climate change. See Appendix Item 12 detail.
Snam S.p.A.	<p>Provide communications, media relations, strategic counsel to promote Snam as a green energy company. Client engagement began 1-18-2022.</p> <p>Activities included:</p> <ul style="list-style-type: none"> •Strategic counsel and planning •Message development •Stakeholder identification and engagement

Foreign Principal(s)	Activities/Services
United Nations Development Programme on behalf of the Government of Panama 2	<p>UNDP communications campaign on behalf of Government of Panama, Ministry of Foreign Affairs, with focus on raising Panama's profile in the U.S and EU markets. Activities include:</p> <ul style="list-style-type: none">• Strategic counsel and program management• Development of narrative• Content development for media relations and Mission Panama platform (website and social media channels)• Stakeholder engagement support <p>*New engagement began 1/1/2022</p>

Appendix

Response to Item 12-Desc

United Nations Development Programme on behalf of the Government of Panama: UNDP communications campaign on behalf of Government of Panama, Ministry of Foreign Affairs, with focus on raising Panama's profile in the U.S and EU markets.

Neom Company: Raise awareness of NEOM Company, which is wholly-owned by the PIF, technology offerings in the U.S.

Bahrain Economic Development Board: Support the Bahrain Economic Development Board, a government body, with media relations to raise awareness of Bahrain brand and investment to U.S. and other markets.

Mashreqbank psc: No Political Activity

AXA: Increase visibility of AXA and it's leadership among key stakeholders on priority U.S. topics.

Snam S.p.A.: No Political Activity

United Nations Development Programme on behalf of the Government of Panama 2: UNDP communications campaign on behalf of Government of Panama, Ministry of Foreign Affairs, with focus on raising Panama's profile in the U.S and EU markets.

Appendix

Response to Item 12-Detail

Foreign Principal(s)	Date	Contact	Method	Purpose
Bahrain Economic Development Board	11/09/2021	International Media	Cision Press Release	Raise awareness of Bahrain as a global mfg supply chain hub
AXA	12/13/2021	John Kerry (roundtable with AXA CEO)	Roundtable	Discuss efforts to combat climate change and research on climate change
AXA	12/22/2021	Energy Secretary Jennifer Granholm (Call with AXA CEO)	Telephone	Discuss efforts to combat climate change and research on climate change
AXA	01/21/2022	Anna Yelverton, Sen. Chris Coons Office (call w/ AXA GC and Head of Sustainability)	Telephone	Discuss efforts to combat climate change and research on climate change
AXA	01/21/2022	D. Hayes, Special Assistant to the President on Climate (Call with AXA CEO)	Telephone	Discuss efforts to combat climate change and research on climate change
United Nations Development Programme on behalf of the Government of Panama 2	01/26/2022	Yael Belkind, Office of the Vice President	Email	Email meeting request.

Appendix

Response to Item 14(a)-Desc

Neom Company: No receipts received during the report period. Engagement with foreign principal began October 2021.

Bahrain Economic Development Board: No receipts received during the report period and engagement with foreign principal has ended during report period. Amendment to be filed when receipts have been received.

Mashreqbank psc: No receipts received during the report period and engagement with foreign principal has ended during report period. Amendment to be filed when receipts have been received.

Snam S.p.A.: No receipts received during the report period. Engagement with foreign principal began January 2022.

United Nations Development Programme on behalf of the Government of Panama 2: No receipts received during the report period. New engagement with foreign principal began January 2022.

Appendix

Response to Item 14(a)-Detail

Foreign Principal(s)	Date Received	From Whom	Purpose	Amount	Subtotal
United Nations Development Programme on behalf of the Government of Panama	10/01/2021	UNDP Panama Ministry Client	Professional Fees	\$127,500.00	
United Nations Development Programme on behalf of the Government of Panama	11/15/2021	UNDP Panama Ministry Client	Professional Fees	\$191,250.00	
United Nations Development Programme on behalf of the Government of Panama	12/15/2021	UNDP Panama Ministry Client	Professional Fees	\$318,750.00	
United Nations Development Programme on behalf of the Government of Panama	12/24/2021	UNDP Panama Ministry Client	Professional Fees	\$255,000.00	
United Nations Development Programme on behalf of the Government of Panama	-----	-----	-----	----->	\$892,500.00
AXA	08/27/2021	Client AXA	Fees for July 2021 Services	\$24,910.00	
AXA	09/18/2021	Client AXA	Fees for August 2021 Services	\$24,910.00	
AXA	10/16/2021	Client AXA	Fees for September 2021 Services	\$24,910.00	
AXA	11/06/2021	Client AXA	Fees for October 2021 Services	\$24,910.00	
AXA	12/11/2021	Client AXA	Fees for November 2021 Services	\$24,910.00	
AXA	12/20/2021	Client AXA	Travel Cost OOPs	\$ 443.70	
AXA	12/20/2021	Client AXA	Fees for December 2021 Services	\$24,910.00	
AXA	-----	-----	-----	----->	\$149,903.70

Appendix

Response to Item 15(a)-Desc

United Nations Development Programme on behalf of the Government of Panama: No disbursements during the report period.

Engagement with foreign principal ended 12-31-2021.

Mashreqbank psc: No disbursements incurred during the report period.

Snam S.p.A.: No disbursements incurred during the report period. Engagement with foreign principal began 1-18-2022.

United Nations Development Programme on behalf of the Government of Panama 2: No disbursements incurred during the report period. Engagement with foreign principal began January 2022.

Appendix

Response to Item 15(a)-Detail

Foreign Principal	Date	Recipient	Purpose	Amount	Subtotal
Neom Company	10/04/2021	Bloxam, A.	Airfare	\$ 4,230.47	
Neom Company	10/04/2021	Willia, E.	Airfare	\$ 3,792.47	
Neom Company	10/04/2021	Willia, E.	Limousine/Car Service	\$ 15.00	
Neom Company	10/04/2021	Giff, J.	Train/Rail Transportation	\$ 30.00	
Neom Company	10/04/2021	Gregory, H.	Train/Rail Transportation	\$ 149.00	
Neom Company	10/07/2021	FARA - DOJ	Filing Fees	\$ 305.00	
Neom Company	10/11/2021	Sullivan, J.	Passport/Visa Fees	\$ 15.31	
Neom Company	10/12/2021	Cazalet, E.	Passport/Visa Fees	\$ 105.93	
Neom Company	10/12/2021	Biagioni, G.	Passport/Visa Fees	\$ 109.17	
Neom Company	10/13/2021	Lehner, T.	Airfare	\$ 26.00	
Neom Company	10/13/2021	Sullivan, J.	Passport/Visa Fees	\$ 142.66	
Neom Company	10/13/2021	Lehner, T.	Passport/Visa Fees	\$ 143.90	
Neom Company	10/15/2021	Sullivan, J.	Airfare	\$ 52.00	
Neom Company	10/18/2021	Biagioni, G.	Passport/Visa Fees	\$ 159.20	
Neom Company	10/18/2021	Cazalet, E.	Hotels/Lodging	\$ 5.00	
Neom Company	10/18/2021	Lock, B.	Hotels/Lodging	\$ 5.00	
Neom Company	10/19/2021	Cazalet, E.	Passport/Visa Fees	\$ 69.00	
Neom Company	10/22/2021	Sullivan, J.	Airfare	\$ 5,527.33	
Neom Company	10/22/2021	Lehner, T.	Ground Transit Charges	\$ 67.81	
Neom Company	10/22/2021	Sullivan, J.	Ground Transit Charges	\$ 81.49	
Neom Company	10/22/2021	Biagioni, G.	Passport/Visa Fees	\$ 50.00	
Neom Company	10/22/2021	Lehner, T.	Airfare	\$ 7,103.63	
Neom Company	10/23/2021	Sullivan, J.	Ground Transit Charges	\$ 66.66	
Neom Company	10/23/2021	Lehner, T.	Ground Transit Charges	\$ 12.32	
Neom Company	10/23/2021	Lehner, T.	Internet Connectivity Fee	\$ 19.68	
Neom Company	10/23/2021	Lehner, T.	Mobile Charge	\$ 35.27	
Neom Company	10/23/2021	Sullivan, J.	Travel-Meals / Subsistence	\$ 54.00	
Neom Company	10/23/2021	Sullivan, J.	Travel-Meals / Subsistence	\$ 6.40	
Neom Company	10/24/2021	Lehner, T.	Ground Transit Charges	\$ 26.98	
Neom Company	10/24/2021	Sullivan, J.	Travel-Meals / Subsistence	\$ 117.60	
Neom Company	10/25/2021	Cazalet, E.	Hotels/Lodging	\$ 5.00	
Neom Company	10/25/2021	Lehner, T.	Ground Transit Charges	\$ 9.21	
Neom Company	10/25/2021	Lock, B.	Airfare Cancelled Fees	\$ 58.20	
Neom Company	10/25/2021	Cazalet, E.	Airfare	\$ 4,536.17	
Neom Company	10/25/2021	Sullivan, J.	Travel-Meals / Subsistence	\$ 207.60	
Neom Company	10/26/2021	Sullivan, J.	Ground Transit Charges	\$ 42.66	
Neom Company	10/26/2021	Lehner, T.	Ground Transit Charges	\$ 10.35	
Neom Company	10/26/2021	Sullivan, J.	Travel-Meals / Subsistence	\$ 138.00	
Neom Company	10/26/2021	Lehner, T.	Travel-Meals / Subsistence	\$ 19.01	

Foreign Principal	Date	Recipient	Purpose	Amount	Subtotal
Neom Company	10/27/2021	Sullivan, J.	Ground Transit Charges	\$ 130.70	
Neom Company	10/27/2021	Sullivan, J.	Travel-Meals / Subsistence	\$ 53.67	
Neom Company	10/27/2021	Sullivan, J.	Conference Registration Passport/Visa Fees	\$ 106.67	
Neom Company	10/28/2021	Sullivan, J.	Ground Transit Charges	\$ 69.32	
Neom Company	10/28/2021	Sullivan, J.	Airfare	\$ 5,385.40	
Neom Company	10/28/2021	Lehner, T.	Ground Transit Charges	\$ 58.93	
Neom Company	10/28/2021	Cazalet, E.	Hotels/Lodging	\$ 1,896.98	
Neom Company	10/28/2021	Sullivan, J.	Hotels/Lodging	\$ 2,186.69	
Neom Company	10/28/2021	Sullivan, J.	Limousine/Car Service	\$ 50.60	
Neom Company	10/28/2021	Sullivan, J.	Travel-Meals / Subsistence	\$ 13.80	
Neom Company	10/28/2021	Sullivan, J.	Travel-Meals / Subsistence	\$ 5.87	
Neom Company	10/29/2021	Cision Group	Media Services	\$ 7,835.49	
Neom Company	11/01/2021	Dascalu, C.	Ground Transit Charges	\$ 17.55	
Neom Company	11/01/2021	Cazalet, E.	Currency Conversion Passport/Visa Fees	\$ 56.72	
Neom Company	11/01/2021	Lock, B.	Airfare	\$ 30.00	
Neom Company	11/01/2021	Dascalu, C.	Ground Transit Charges	\$ 97.50	
Neom Company	11/02/2021	Lehner, T.	Passport/Visa Fees	\$ 107.47	
Neom Company	11/02/2021	Lehner, T.	Ground Transit Charges	\$ 94.30	
Neom Company	11/02/2021	Lehner, T.	Hotels/Lodging	\$ 240.86	
Neom Company	11/02/2021	Lehner, T.	Internet Connectivity Fee	\$ 33.54	
Neom Company	11/02/2021	Lehner, T.	Mobile Charge	\$ 130.00	
Neom Company	11/02/2021	Lehner, T.	Travel-Meals / Subsistence	\$ 54.00	
Neom Company	11/02/2021	Lehner, T.	Travel-Meals / Subsistence	\$ 346.44	
Neom Company	11/03/2021	Lehner, T.	Hotels/Lodging	\$ 368.37	
Neom Company	11/04/2021	Lehner, T.	Hotels/Lodging	\$ 368.37	
Neom Company	11/05/2021	Lehner, T.	Hotels/Lodging	\$ 368.37	
Neom Company	11/06/2021	Lehner, T.	Hotels/Lodging	\$ 368.37	
Neom Company	11/07/2021	Lehner, T.	Hotels/Lodging	\$ 283.36	
Neom Company	12/01/2021	Cazalet, E	Limousine/Car Service	\$ 217.64	
Neom Company	12/14/2021	B.Lock/ E.Cazalet	Ground Transit Charges	\$ 139.49	
Neom Company	12/21/2021	Wiam Aldakhel	Public Relations Services	\$ 2,132.00	
Neom Company	01/29/2022	Cision Group	Media Services	\$ 7,835.49	
Neom Company	-----	-----	-----	----->	\$58,634.44
Bahrain Economic Development Board	11/09/2021	Cision Media Services	Press Release	\$ 3,412.00	
Bahrain Economic Development Board	-----	-----	-----	----->	\$ 3,412.00
AXA	09/28/2021	Employee S. Neary Transportation - Train/Ground Transportation	Client/Reporter Meeting	\$ 326.98	
AXA	09/28/2021	S. Neary Meals	Client/Reporter Meeting	\$ 68.72	
AXA	09/28/2021	S. Neary Parking	Client/Reporter Meeting	\$ 48.00	
AXA	-----	-----	-----	----->	\$ 443.70

Appendix

Response to Item 18-List

Item 18-List: During this 6 month reporting period, has the registrant's activities in preparing, disseminating or causing the dissemination of informational materials include the use of any of the following:

Foreign Principal	Informational Materials
United Nations Development Programme on behalf of the Government of Panama	Press releases
United Nations Development Programme on behalf of the Government of Panama	Website URL(s): http://missionpanama.gob.pa/
United Nations Development Programme on behalf of the Government of Panama	Social media websites (URLs): @twittermissionpanama
United Nations Development Programme on behalf of the Government of Panama	Email
Neom Company	Press releases
Bahrain Economic Development Board	Press releases
United Nations Development Programme on behalf of the Government of Panama 2	Website URL(s): http://missionpanama.gob.pa/
United Nations Development Programme on behalf of the Government of Panama 2	Social media websites (URLs): @twittermissionpanama

Appendix

Response to Item 19-List

Item 19-List: During this 6 month reporting period, has the registrant prepared, disseminated, or caused to be disseminated informational materials among any of the following groups:

Foreign Principal	Recipients
United Nations Development Programme on behalf of the Government of Panama	Other (specify): Media
United Nations Development Programme on behalf of the Government of Panama	Newspapers
United Nations Development Programme on behalf of the Government of Panama	Editors
Neom Company	Newspapers
Bahrain Economic Development Board	Newspapers
United Nations Development Programme on behalf of the Government of Panama 2	

Appendix

Response to Item 20-List

Item 20-List: Indicate the language used in the informational materials:

Foreign Principal	Language Used
United Nations Development Programme on behalf of the Government of Panama	English
Neom Company	English
Bahrain Economic Development Board	English
United Nations Development Programme on behalf of the Government of Panama 2	English

Appendix

Response to Item 21-List

Item 21-List: Has the registrant filed with the FARA Unit, U.S. Department of Justice a copy of each item of such informational materials prepared, disseminated or caused to be disseminated during this 6 month reporting period? If no, please please file the required informational materials.

Foreign Principal	Filed
United Nations Development Programme on behalf of the Government of Panama	No
Neom Company	Yes
Bahrain Economic Development Board	Yes
United Nations Development Programme on behalf of the Government of Panama 2	No

Appendix

Response to Item 22-List

Item 22-List: Has the registrant labeled each item of such informational materials with the statement required by Section 4(b) of the Act?

Foreign Principal	Label
United Nations Development Programme on behalf of the Government of Panama	Yes
Neom Company	Yes
Bahrain Economic Development Board	No
United Nations Development Programme on behalf of the Government of Panama 2	Yes